

1 John T. Wilson\* (Texas Bar No. 24008284)  
2 Jennifer M. Rynell\* (Texas Bar No. 24033025)  
3 eservice@wwrlegal.com  
4 **WILSON WHITAKER RYNELL**  
5 Wilson Legal Group P.C.  
6 16610 Dallas Parkway, Suite 1000  
7 Dallas, Texas 75248  
8 (T) 972-248-8080  
9 (F) 972-248-8088  
10 \*Admitted Pro Hac Vice

11 Glenn T. Litwak (State Bar No. 91510)  
12 glenn@glennlitwak.com  
13 **LAW OFFICES OF GLENN T. LITWAK**  
14 201 Santa Monica Boulevard, Suite 300  
15 Santa Monica, California 90401  
16 (T): 323-518-2826  
17 (F): 310-207-4180

18 **ATTORNEYS FOR NHENTAI.NET**

19 UNITED STATES DISTRICT COURT  
20 CENTRAL DISTRICT OF CALIFORNIA

21 PCR DISTRIBUTING CO., a company  
22 organized under the laws of California,

23 *Plaintiff*

24 vs.

25 JOHN DOES 1-20 d/b/a  
26 NHENTAI.NET,

27 *Defendants*

Case No. 2:24-mc-07453-CV-AJR

**DECLARATION OF JENNIFER M.  
RYNELL IN SUPPORT OF  
NHENTAI.NET'S REPLY ON  
MOTION TO DISMISS (FED. R.  
CIV. P. 12(b)(6)) AND STRIKE  
(FED. R. CIV. P. 12(f))**

Date: March 28, 2025  
Time: 1:30 p.m.  
Place: First Street Courthouse  
350 W. 1st Street, Courtroom 5D  
5th Floor  
Los Angeles, California 90012  
Honorable Judge Cynthia Valenzuela

1 I, Jennifer M. Rynell, hereby state and declare as follows:

2 1. I am a partner in the law firm of Wilson Whitaker Rynell in Dallas,  
3 Texas and one of the attorneys for Nhentai.net admitted *pro hac vice* in the above-  
4 referenced matter. I have personal knowledge of the facts stated herein.

5 2. I provide this declaration in support of Nhentai.net's ("Nhentai.net")  
6 Reply on its Motions to Dismiss and/or Strike ("Motions").

7 3. During the meet-and-confer prior to the filing of the Motions, Plaintiff's  
8 counsel stated that he had never seen the Copyright Office correspondence relating  
9 to the asserted copyrights.

10 4. During the meet-and-confer prior to the filing of the Motions, when I  
11 raised the issue of the very narrow scope of the asserted copyrights, if any, counsel  
12 for Plaintiff stated that Plaintiff would go back to the artists, file new copyrights, and  
13 then sue Nhentai.net again.

14 5. During the meet-and-confer prior to the filing of the Motions, Plaintiff's  
15 counsel represented he had a copy of the fictitious business name filing at issue. I  
16 requested a copy of that document, explaining that we had been unable to locate it  
17 with the number provided in Plaintiff's First Amended Complaint ("FAC"). No such  
18 document was ever provided by Plaintiff's counsel prior to the filing of Plaintiff's  
19 opposition to the Motions seven days ago.

20 6. Much of the content of the material in the asserted copyrights depicts  
21 characters performing sex acts with short phrases or sounds that accompany the acts.

22 7. I was able to locate on another website what appears to actually be the  
23 first page or cover of the work "Sexual Healing." I last visited  
24 <https://hmarket.io/shop/sexual-healing/> on March 14, 2025. **Exhibit A** attached  
25 hereto is a true and correct partial screenshot of what appeared at the URL  
26 <https://hmarket.io/shop/sexual-healing/> on the date visited, which has been redacted  
27 to remove the sexually explicit image below the title of the work "Sexual Healing."

1 8. Clicking the link in Plaintiff's FAC, Exhibit C to "Sexual Healing" *does*  
2 *not yield the result* in the partial image with the title "Sexual Healing" shown in the  
3 Reply and in Exhibit A attached hereto.

4 9. The newly asserted work in the FAC called "She's Somebody's  
5 Spouse" (TXu002391218) – when you click the link directly in the FAC ¶ 59 –  
6 shows that it was uploaded four years and two months ago, as of the date of this  
7 filing.

8 I declare under penalty of perjury that the foregoing is true and correct.

9 Executed on March 14, 2025 in Dallas, Texas.

10  
11   
12 Jennifer M. Rynell

13 **CERTIFICATE OF SERVICE**

14 On March 14, 2025, I filed the foregoing document with the clerk of court  
15 for the U.S. District Court, Central District of California via CM/ECF. I hereby  
16 certify that I thereby have served the document on all counsel and/or pro se parties  
17 of record by a manner authorized by Federal Rule of Civil Procedure 5(b)(2) and  
18 the Local Rules.

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21 Jennifer M. Rynell  
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